



August 16, 2024

VIA ECF

Honorable Jessica S. Allen, U.S.M.J.
U.S. District Court for the District of New Jersey
Martin Luther King Jr. Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: *White, et al. v. Samsung Electronics America, Inc., et al.*
Case No. 17-1775 (MCA)(JSA)

Dear Magistrate Judge Allen:

In accordance with the parties' August 2, 2024 joint letter to the Court, ECF No. 355, the parties write to update the Court on their discussions following the Mediation session held on June 25, 2024 with Judge Jose L. Linares (Ret.). The parties are continuing to discuss with Judge Linares potential avenues to resolve this matter. On June 28, 2024, Plaintiffs submitted a settlement proposal. On July 29, 2024, SEA provided a counterproposal. Plaintiffs provided edits to SEA's counterproposal on August 1, 2024.

Judge Linares and the parties have tentatively scheduled, pending Samsung's confirmation, a remote conference on Tuesday, August 20, 2024 at 2:00 p.m. ET, to discuss the parties' positions and whether any potential avenues to resolve this matter remain.

Respectfully submitted,

s/ Gregory S. Mullens
Gregory S. Mullens
BLEICHMAR FONTI & AULD LLP

Attorney for Plaintiffs

s/ Michael R. McDonald
Michael R. McDonald

Attorney for Defendant Samsung Electronics America, Inc.

cc: All Counsel of Record (via ECF)